

JUN 11 1993

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June 11, 1993

BY HAND DELIVERYMs. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554Re: Prime Cable of Alaska, L.P.'s ("Prime") and
the Coalition of Small System Operators'
("Coalition") Request for Stay of Rate
Regulations MM Docket 92-266

Dear Ms. Searcy:

On behalf of the Coalition and Prime we submit facsimile copies of executed declarations of Jay Busch of Triax Communications Corporation and Dean Wandry of Fanch Communications, Inc. to be associated with Prime's and the Coalition's Petition for Stay of the Commission's rate regulations. Dean Wandry's executed declaration is the same declaration as was filed this morning. Jay Busch's declaration contains two minor modifications that have no impact upon the arguments set forth in the Petition. Specifically, a typographical error was corrected in paragraph 1, and the last sentence in paragraph 3 was deleted.

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If there are any questions regarding this submission,
please contact the undersigned.

Respectfully submitted,

HOGAN & HARTSON

By 
Gardner F. Gillespie

Attorneys for the
Coalition of Small System
Operators and Prime Cable
of Alaska, L.P.

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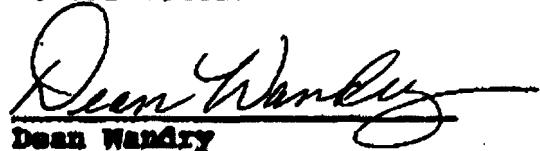
cc: Chairman James H. Quello
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10. In view of the FCC's threat, coupled with the FCC's failure to issue any standards to guide cable operators through their cost-of-service analysis, Triax simply does not have sufficient information to determine whether it should shut down the system, reduce its rates to benchmark levels, or attempt a cost-of-service analysis.

11. If this were a stand-alone system, the inability to meet the system's interest expenses would require serious

were available, therefore, Fanch would not be able to make decisions regarding the proper rate structures for many of its franchises by June 21, 1993.

15. To illustrate the unique problems faced by small operators with numerous headends, I note that Fanch sent out 1,259 letters to broadcasters by the May 2, 1993 deadline under the new signal carriage rules. In addition, Fanch sent out 2,721 notifications to broadcasters on June 1, 1993. And, since May, Fanch has responded to 275 additional inquiries asking for clarification or additional information relating to the new signal carriage rules. Fanch has already received requests for negotiations for retransmission consent from broadcasters, and we expect to participate in more than 100 separate retransmission negotiations before October of this year.


Dean Wandy

Date: 6-11-93

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